

## REMARKS

Applicants certainly appreciate the indication of allowance of claims 4-10 if amended to become independent, incorporating the requirements of the parent claim and any intervening claims. Applicants have accordingly amended these claims. Please charge the fee for the additional independent claims and any other fees that may be required to ABB Vetco Deposit Account. 22-0279. Applicants have amended the abstract to correct grammatical errors. Applicants are enclosing copies of the pending applications listed in the previously sent information disclosure statement.

Applicants respectfully traverse the restriction requirement in regard to claims 11-16. Claim 11 has all of the requirements of original claim 1 with additional requirements, such as generally those in claims 3 and 4. Claim 11 could not be practiced without infringing original claim 1. Steps a, b and d are similar to steps a and b of original claim 1. Steps e and f of claim 11 are similar to steps b and c of claim 1. Further, Applicants are willing to place the same amendments to claim 11 that they have placed in claim 1. Claims 12-16 depend from claim 11. Therefore, Applicants submit that the application should not be subject to a restriction requirement.

Applicants respectfully traverse the rejection of claim 1 over the cited art. A key distinction from what is claimed and Silcox is the requirement that the production tree be lowered on a lift line. A lift line is a cable that is deployed from a winch. A lift line is thus distinguishable from an oil well drilling derrick. An oil well drilling derrick has a draw works that is capable of lowering strings of pipe. As noted in Figure 15, lift line 109 connects directly to the production tree, which is lowered on a winch or crane that is spaced from the well drilling derrick assembly 197.

The references do not show deploying a tree on a lift line. In Silcox, the first well to be drilled within a template 100 is shown being drilled in Figures 2-5. As explained at column 4, lines 40-55, after the first well is drilled, tubing is run, then well plugs are secured in the tubing. Then, the other wells are drilled in the same manner and completed with tubing in sequence. Then, once all of the wells are drilled, the production unit 112 is lowered in place as shown in Figure 6 on a running string 104 of pipe. A control pod is shown being installed in Figure 7. Figure 8 shows running of a first tree 130. Tree 130 is run on a completion riser 146 made up of pipe. Tree 170 is not lowered on a lift line from a winch, rather it is lowered by the well drilling derrick assembly. While Christmas tree 130 is being lowered, the derrick assembly is employed in that task and is not performing operations on other wells. Each tree 130 is sequentially run by the derrick assembly.

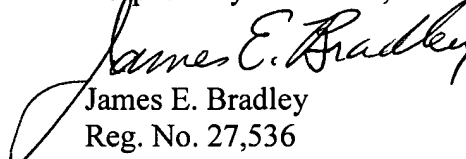
Claim 1 as amended requires with the well drilling derrick drilling the first well, disconnecting the drilling riser and connecting it to a second wellhead housing and performing operations on a second well. The claim requires that while performing at least part of the operations on the second well with the derrick, connecting a lift line to a production tree, the lift line being from a lift line winch that is on the same floating platform and spaced away from the well drilling derrick assembly. This is not suggested in Silcox, which teaches to lower the tree on a completion riser, not a lift line. Silcox does not show performing completion operations on one well while simultaneously performing drilling operations on another well.

Scott discloses two separate well drilling assemblies located within a single derrick structure. First and second mini-derricks 132 and 134 are shown in Figure 5 and described in column 6, lines 34-37. There are two separate traveling blocks, 152 and 154 (column 6, line 43). The various simultaneous operations being performed to the two wells are performed with the

two separate derrick assemblies. Column 12, lines 35-40 state that the operator can run trees with the auxiliary rotary station while carrying out normal operations with the primary rotary station. The operator can also simultaneously run two subsea trees with the two derrick subassemblies. In all cases, the simultaneous work on two wells is performed with the two drilling derrick subassemblies. The reference does not suggest utilizing a lift line to run a tree while performing drilling operations on another well with the derrick. Cranes 72 and 82 with lift line winches are shown in several of the drawings, but there is no suggestion of using them to run a subsea tree.

A subsea tree is a large, heavy structure that is typically run with a completion riser or another string of pipe such as drill pipe from the well drilling derrick assembly. Providing two derricks, or a single derrick with two derrick subassemblies as shown in Scott, is complex and expensive. Applicants have disclosed that with the same platform, one can run a subsea tree from a lifeline while simultaneously performing operations on another well with the drilling derrick assembly. Applicants respectfully request reconsideration and favorable action.

Respectfully submitted,

  
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